

State of Florida

Commissioners:  
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Public Service Commission AUG 19 1994

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August 18, 1994

VIA FEDERAL EXPRESS

Mr. William F. Caton  
Acting Secretary  
Federal Communications Commission  
1919 M Street, N.W., Room 222  
Washington, D.C. 20554

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Re: In the Matter of REQUESTS OF FEDERAL AGENCIES AND OTHERS FOR  
THE ASSIGNMENT OF N11 CODES  
Docket No. CC 92-105

Dear Mr. Caton:

On behalf of the Florida Public Service Commission, please find enclosed an original and nine copies of the Commission's COMMENTS in the above docket. An extra Copy is also enclosed with a stamped, self-addressed envelope; please date stamp and return.

Please contact me should you have any questions concerning this matter.

Sincerely,

A handwritten signature in cursive script, reading "Cynthia B. Miller".

Cynthia B. Miller  
Associate General Counsel

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Enclosures

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BEFORE THE

AUG 19 1994

Federal Communications Commission

WASHINGTON, D.C.

In the Matter of )

Requests of Federal Agencies )  
and Others for the Assignment )  
of N11 Codes. )

CC Docket No. 92-105  
(IAD File No. 94-101)

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COMMENTS OF THE  
FLORIDA PUBLIC SERVICE COMMISSION

The Florida Public Service Commission has several concerns with the statewide/nationwide reservation of N11 codes as requested by the Petitioners. These concerns include the technical feasibility of making N11 codes ubiquitously available for the requested purposes, the actual benefits of using N11 codes versus other access arrangements, and the potential costs to implement the requested plans.

First, based on a proceeding before the Florida Public Service Commission it does not appear that N11 could be uniformly implemented on a nationwide basis. Evidence in the Florida proceedings indicated that N11 codes are not available in all exchanges in the country. This would negate much of the primary purpose of nationwide N11 code assignment which is the nationwide use of a single number for access to a particular service. Currently, 800, 900, and 700 numbers are available from every telephone exchange in the country, as well as 950-XXXX access and the little-used 555-XXXX prefix. Any of these dialing arrangements would be more suitable for the purposes requested by the Petitioners, if nationwide coverage is the issue.

Second, the Florida Public Service Commission does not see a significant social benefit from the use of N11 codes versus other access arrangements for the purposes requested by the Petitioners. N11 codes, as provisioned in Florida, are simply local abbreviated access codes that are translated into regular seven digit numbers before being sent through the local telephone network. This is true for all N11 codes: local directory information (411), E-911 services, as well as commercial N11 services.

Using N11 codes for a single nationwide purpose will require the state or federal agency or service to have a local access presence in every local exchange area in the country. This could only be done through a physical presence, a SprintNet-type local node (such as Prodigy, CompuServe, America Online, etc. use), or some toll arrangement such as an 800 number. Since SprintNet-type nodes are also unavailable in many parts of the country, an 800-type arrangement seems likely. The potential costs of this arrangement could be burdensome to the agency or the consumer. We believe that a direct arrangement through an 800 number would be a significantly more efficient access arrangement than an N11 number that would be immediately translated into the same 800 number anyway.

Also, the myriad of state and government agencies would not lend themselves well to N11 access. We anticipate that the N11 numbers, unless used for periodic specific purposes such as flood/disaster information, will be used as gateways to government agencies. Evidence in the Florida proceedings indicated that commercial entities were not interested in using N11 numbers as gateways.<sup>1</sup>

The two major benefits of N11 service in Florida are that the service is convenient and easy to remember by consumers and able to include billing and collection for pay-per-call applications with minimal network reconfiguration and minimal customer confusion.<sup>2</sup> If neither the Petitioners nor the relay advocates intend to use N11 codes as pay-per-call services, it becomes merely a convenience issue: do I dial three digits, or eleven?

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<sup>1</sup> Evidence in the Florida proceeding also suggested that audiotext gateways in general have historically been failures. We believe that one of the principle reasons for their failure has been that consumers are unwilling to wait the extended periods of time to navigate complicated audio menus. The FCC alone has dozens of divisions, bureaus, and offices that could take several minutes just to list on an audiotext service. The State of Florida's telephone directory is nearly 600 pages long. Conversely, videotext services such as America Online have been more successful partly because consumers can see and choose from several menu options at once.

<sup>2</sup> We believe that pay-per-call arrangements made through existing seven-digit access, as offered in some states, would create more customer confusion than the use of N11 numbers. Customers dialing a number such as 222-1234 may not know whether they are dialing a business or a pay-per-call service. This is one reason why the 976 prefix was specifically reserved nationwide for the sole purpose of pay-per-call services. N11 numbers, on the other hand, are unique by nature, and customers are already used to using 411 as a pay-per-call service.

Finally, the costs associated with individually equipping the central offices to accept and translate N11 numbers are significant. Estimates for implementing N11 service throughout Florida are approximately \$3 million per N11 number. This could translate into nationwide costs of \$250 million or more if three numbers are assigned.

In contrast, a nationwide 800 number could be used for telecommunications relay services if a single nationwide number is desired. Calls to this number could then be screened for originating ANI and routed to the appropriate relay center. Although we do not know what costs are involved with this process, we doubt they would approach the costs of implementing nationwide N11 codes. We do not believe the social benefits from such N11 assignments appear worth the costs to implement them.

Although we have significant concerns over the use of N11 codes for telecommunications relay services and federal/state government access, we are aware that a few states may have networks expansive enough for N11 access to be possible. One such state is Florida, where our statewide Suncom telephone system has a local presence in 99 percent of Florida's local exchanges. Therefore, it is possible to provide near-statewide access via N11 codes here in Florida, although most likely it will necessitate a pay-per-call arrangement unless the state government absorbs the toll and transport costs.

Therefore, to accommodate this possibility, the Florida Public Service Commission would not oppose an arrangement where the 211 access code is reserved for use by the states at their option. This will be a similar arrangement as 611 and 811, which are currently reserved for local telephone company use at their option.<sup>3</sup> This will allow states that are both capable and desirous of this arrangement to utilize 211 access, while other states could allow 211 to be used by local information providers or for other local purposes until their state's government developed a specific plan to implement 211 access.

This is consistent with current N11 code use in Florida, where Southern Bell has kept 611 for repair service but has allowed 811 to be used by information service providers. N11 code use by information service providers here is a temporal phenomenon; potential users are aware that N11 code use will

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<sup>3</sup> These parameters are outlined in BOC Notes on the LEC Networks, the standard industry reference on N11 codes. This document differentiates assigned numbers (411 and 911) that are used universally for the indicated purposes, and reserved numbers (611 and 811) which can be used by the local telephone company at its option, or used for "other local purposes."

migrate to other abbreviated dialing arrangements as they become available, or as additional N11 codes are used for public purposes. We therefore see no additional impediment to adding 211 to the list of "reserved" numbers.

In summary, the Florida Public Service Commission believes that other access arrangements such as 800, 900, 950, or 700 numbers, or the little used 555-XXXX prefix, are more suited and more easily adapted for a single nationwide use for many of the requested purposes. N11 codes have been and should continue to be used for limited, local purposes such as local directory assistance, local E-911, and local information services. We do not oppose the request of the state telecommunications directors, so long as 211 is reserved for use at each state's option and not assigned nationally, as we expect relatively few states will be able to take advantage of 211 access.

Respectfully submitted,

  
Cynthia B. Miller  
Associate General Counsel

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Dated: August 18, 1994

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